

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JOSHUA WINER,

Plaintiff,

v.

UMAYMAH MOHAMMAD, et al.,

Defendants.

Civil Action No.: 1:25-cv-02329-TWT

CONSENT MOTION FOR EXTENSION OF TIME
FOR PLAINTIFF’S RESPONSE TO MOTION TO DISMISS

Pursuant to Fed. R. Civ. P. 6(b) and Local Rule 7.1, Plaintiff Joshua Winer (“Plaintiff”) and Defendant Cair-Nga, Inc., (“CAIR-Georgia”) file this consent motion to extend the time for Plaintiff to respond to CAIR-Georgia’s motion to dismiss Plaintiff’s amended complaint through July 21, 2025.

1. CAIR-Georgia filed its motion to dismiss on June 27, 2025, which would make Plaintiff’s responsive deadline July 11, 2025.

2. Given Plaintiff’s counsel’s schedule and the volume of the motion to dismiss, CAIR-Georgia has agreed to stipulate to extend the time for Plaintiff to respond to its motion to dismiss through July 21, 2025.

3. This consent motion is made in good faith and no party will be prejudiced as a result of the extension.

4. A proposed order reflecting the agreed-upon extension of time is submitted with this motion.

Dated: July 7, 2025

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Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(B) in Times New Roman 14-point typeface.

Dated: July 7, 2025.

/s/ David F. Katz

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